

JEROME R. BOWEN, ESQ.  
Nevada Bar No. 4540  
**BOWEN LAW OFFICES**  
9960 W. Cheyenne Ave., Suite 250  
Las Vegas, Nevada 89129  
Telephone: (702) 240-5191  
Facsimile: (702) 240-5797  
twilcox@lvlawfirm.com  
*ATTORNEYS FOR PLAINTIFF*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

\* \* \*

WILLIE WORTHAMS, individually;

Case No. 2:24-cv-00023-RFB-NJK

Plaintiffs,

vs.

GEICO CHOICE INSURANCE COMPANY,  
a foreign entity; LEWIS BRISBOIS  
BISGAARD & SMITH, LLP, a foreign  
limited liability partnership; LEWIS ROCA  
ROTHGERBER, CHRISTIE, LLP, a foreign  
limited liability partnership; DOES I through  
X, inclusive; and ROE CORPORATIONS I  
through V, inclusive,

Defendants,

**STIPULATION TO EXTEND THE DATE FOR PLAINTIFF TO FILE IT'S  
RESPONSE TO GEICO'S MOTION TO QUASH AND FOR PROTECTIVE ORDER  
REGARDING THE DEPOSITION OF WADE M. HANSARD (ECF 111)**  
**(First Request)**

Plaintiff, WILLIE WORTHAMS; Defendant, GEICO CHOICE INSURANCE COMPANY  
have stipulated and agreed to a one week extension of time from March 5, 2025 to March 12, 2025  
for Plaintiff to File His Response to GEICO's Motion to Quash and for Protective Order Regarding  
the Deposition of Wade M. Hansard (ECF 111) filed on February 19, 2025. The parties also have  
stipulated and agreed that Defendant GEICO will get an additional one week extension to file its

**BOWEN LAW OFFICES**  
Conquistador Plaza  
9960 W. Cheyenne Ave., Suite 250  
Las Vegas, Nevada 89129  
702-240-5191 FAX: 702-240-5797

1 Reply.

2 The reasons supporting this stipulation are as follows: Plaintiff's counsel has been preparing  
3 and engaged in a multi-day product defect mediation, other out of state depositions, and thus,  
4 Plaintiff's counsel requires additional time to adequately prepare and respond to the Motion. The  
5 Plaintiff desires to provide the Court a complete outline of facts and issues.

6 This is the first extension of time requested by the Parties related to this Motion, which is  
7 made in good faith and not for purposes of delay.

8 DATED this 4<sup>th</sup> day of March, 2025.

9 **BOWEN LAW OFFICES**

**MCCORMICK, BARSTOW, SHEPPARD,  
WAYTE & CARRUTH, LLP**

10 /s/ Jerome R. Bowen, Esq.  
11 JEROME R. BOWEN, ESQ.  
Nevada Bar No. 4540  
12 9960 W. Cheyenne Ave., Suite 250  
Las Vegas, Nevada 89129  
13 Attorneys for Plaintiff

/s/ Jonathan W. Carlson, Esq.  
JONATHAN W. CARLSON, ESQ.  
Nevada Bar No. 40536  
PAMELA L. MCGAHA, ESQ.  
Nevada Bar No. 8181  
MANDY VOGEL, ESQ.  
Nevada Bar No. 16150  
8337 West Sunset Road, Suite 350  
Las Vegas, Nevada 89113  
Attorneys for GEICO CHOICE INSURANCE  
COMPANY

14  
15  
16  
17  
18 **IT IS SO ORDERED.**

19  
20 DATED this 6th day of March, 2025.

21  
22   
UNITED STATES MAGISTRATE JUDGE  
23  
24  
25  
26  
27